

## UNITED STATES DISTRICT COURT

for the

District of New Jersey



United States of America

v.

Case No.

Mag. No. 25-17009 (SAK)

JUNIOR ALFREDO ESCOBAR VARGAS

*Defendant(s)*

## CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of February 21, 2025 in the county of Atlantic in the  
                     District of New Jersey, the defendant(s) violated:

*Code Section*

8 U.S.C. Section 1326(a).

*Offense Description*

Illegal Reentry after Deportation and Removal

as more fully described in Attachment A.

This criminal complaint is based on these facts:

See Attachment B- Affidavit of Probable Cause.

☒ Continued on the attached sheet.*Complainant's signature*

Ellen Chao, Deportation Officer, ICE

*Printed name and title*

This affidavit was sworn out via telephone, in compliance with  
 Federal Rule of Criminal  
 Procedure 4.1.

Date:

3/14/25

City and state:

District of New Jersey*Judge's signature*

Honorable Sharon A. King, U.S.M.J.

*Printed name and title*

CONTENTS APPROVED

UNITED STATES ATTORNEY

BY: /s/ Patrick C. Askin  
PATRICK C. ASKIN  
Assistant United States Attorney

Date: March 12, 2025

**ATTACHMENT A**

On or before February 21, 2025, in Atlantic County, in the District of New Jersey, and elsewhere, the defendant,

**JUNIOR ALFREDO ESCOBAR-VARGAS,**

an alien, who had been previously excluded and deported and had departed from the United States, did knowingly and unlawfully enter and was found in the United States without the express consent of the Secretary of the Department of Homeland Security or Attorney General of the United States to reapply for admission prior to his reembarkation at a place outside the United States.

In violation of Title 8, United States Code, Section 1326(a).

ATTACHMENT B

I, Ellen Chao, a Deportation Officer of the U.S. Immigration and Customs Enforcement("ICE"), having conducted an investigation and having spoken with other individuals, have knowledge of the following facts:

1. Defendant Junior Alfredo ESCOBAR-VARGAS is a native and citizen of Honduras.
2. On or about April 11, 2018, defendant Junior Alfredo ESCOBAR-VARGAS, who was a juvenile at the time, was encountered by U.S. Border Patrol agents along with his mother, also a citizen of Honduras, in the Rio Grande Valley region of Texas. On or about August 13, 2018, a supervisory U.S. Border Patrol agent ordered defendant ESCOBAR-VARGAS's removal, and he was processed as an Expedited Removal and deported from the United States.<sup>1</sup>
3. On or about November 13, 2018, defendant Junior Alfredo ESCOBAR-VARGAS was encountered by U.S. Customs and Border Protection ("CBP") agents near Hidalgo, Texas. Defendant ESCOBAR-VARGAS entered the United States by crossing the Rio Grande river on a raft. The place where defendant ESCOBAR-VARGAS entered the United States was not designated as a point of entry and therefore, the defendant was not admitted, inspected, or paroled into the United States by a U.S. immigration official.
4. On or about November 15, 2018, defendant Junior Alfredo ESCOBAR-VARGAS was convicted of illegal entry into the United States, in violation of Title 8, United States Code, Section 1325 in the United States District Court for the Southern District of Texas. Dkt 7:18-po-17330. The defendant was sentenced to time served.
5. On or about November 30, 2018, defendant Junior Alfredo ESCOBAR-VARGAS was removed from the United States to Honduras, via a flight from Valley International Airport in Harlingen, Texas.
6. At some point after his November 30, 2018 removal, defendant Junior Alfredo ESCOBAR-VARGAS re-entered the United States without obtaining the express consent of the Attorney General or the Secretary of Homeland Security.
7. On or about November 11, 2024, defendant Junior Alfredo ESCOBAR-VARGAS was arrested in Stafford Township, New Jersey by Stafford Township Police Officers for receiving stolen property.
8. On or about February 21, 2025, ICE Enforcement Removal Officers encountered and arrested defendant Junior Alfredo ESCOBAR-VARGAS. At the time of his arrest, the defendant acknowledged that he was Junior Alfredo ESCOBAR-VARGAS. The defendant had a New Jersey Driver's License and a Honduras identification card with his photo and the date of birth. Both of which are consistent with items contained within his immigration file.

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<sup>1</sup> Based on my training and experience, I know that "Expedited Removal" applies to inadmissible aliens who arrive at a port of entry without any documentation or false documentation. INA § 235(b), 8 U.S.C. § 1225(b).

This affidavit was sworn out via telephone, in compliance with Federal Rule of Criminal Procedure 4.1.



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Ellen Chao  
Deportation Officer  
Immigration and Customs Enforcement

Subscribed and sworn before me this 14th day of March 2025.



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HONORABLE SHARON A. KING  
United States Magistrate Judge